

**IN THE UNITED STATES BANKRUPTCY COURT
FOR THE MIDDLE DISTRICT OF TENNESSEE**

In re:)	
)	Chapter 11
)	
Robert Terry Winfree,)	Case No. 3:20-01417
)	Judge Randal S. Mashburn
Debtor.)	
)	
TN Dental Professionals, P.C., and)	
CPF Dental, LLC, d/b/a Marquee Dental)	
Partners,)	
)	
Plaintiffs/ Counter-Defendants,)	
)	
vs.)	Adv. Proc. No. 3:20-90031
)	
Robert T. Winfree, D.D.S. and Olivia)	
Winfree,)	
)	
Defendants/ Counter-Plaintiffs.)	

**IN THE UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF TEXAS
DALLAS DIVISION**

In re :)	
)	
Subpoena Served on J.T. Palmer)	Civil Action No. 3:20-mc-00055-E-BN
& Associates, LLC)	

**APPENDIX TO TN DENTAL PROFESSIONALS, P.C., AND
CPF DENTAL, LLC, D/B/A MARQUEE DENTAL PARTNERS' RESPONSE
AND BRIEF IN OPPOSITION TO NON-PARTY J.T. PALMER & ASSOCIATES, LLC'S
MOTION TO QUASH SUBPOENA**

Plaintiffs TN Dental Professionals, P.C., and CPF Dental, LLC, d/b/a Marquee Dental Partners (collectively, "**CPF Dental**") files this Appendix Related to Plaintiffs' Response and Brief

in Opposition to Non-Party J.T. Palmer & Associates, LLC's ("JT Palmer") Motion to Quash Subpoena:

- Appendix A:** Collective *Complaint* and *Amended Complaint*
- Appendix B:** Debtor's *Chapter 11 Subchapter V Voluntary Petition for Relief* (Bankruptcy Proceeding, Dkt. No. 1)
- Appendix C:** *Notice of Removal of State Court Action* (Bankruptcy Proceeding, Dkt. No. 9)
- Appendix D:** *Affidavit of Dan Hodges re Foreign Accounts* (State Court Litigation, filed 1/30/2020)
- Appendix E:** Collective *Affidavit of Olivia Winfree re Foreign Accounts* (State Court Litigation, *Defendant's Objection and Memorandum in Opposition to Motion for Temporary Restraining Order*, filed 1/31/2020) and *Affidavit of Robert T. Winfree, D.D.S. re Foreign Accounts* (State Court Litigation, *Notice in Support of Defendant's Objection to Memorandum in Opposition to Motion for Temporary Restraining Order* filed 1/31/2020)
- Appendix F:** Debtor's *Response in Support of Motion to Compel* (Adversary Proceeding, Dkt. No. 33)
- Appendix G:** *Subpoena to Produce Documents* (Adversary Proceeding, Dkt. No. 23)
- Appendix H:** CPF Dental's *Motion to Compel JT Palmer and Associates, LLC to Produce Documents in Accordance with Subpoena* (Adversary Proceeding, Dkt. No. 31)
- Appendix I:** JT Palmer's *Motion to Quash Subpoena*
- Appendix J:** CPF Dental's *Notice of Withdrawal of Motion to Compel JT Palmer and Associates, LLC to Produce Documents in Accordance with Subpoena* on July 20, 2020 (Adversary Proceeding, Dkt. No. 42)
- Appendix K:** Email correspondence from Griffin Dunham, Dr. Winfree's bankruptcy counsel, re Hermitage Investment Group

Dated: July 27, 2020

WALLER LANSDEN DORTCH & DAVIS, LLP

/s/ Evan Atkinson

Evan Atkinson (TX 24091844)

William R. "Trip" Nix (TX 24092902)

(*Admitted pro hac vice*)

100 Congress Ave., Suite 1800

Austin, TX 78701

Telephone: (512) 685-6400

evan.adkinson@wallerlaw.com

trip.nix@wallerlaw.com

*Attorneys for CPF Dental, LLC d/b/a Marquee Dental
Partners and TN Dental Professionals, P.C.*

CERTIFICATE OF SERVICE

I hereby certify that a true and correct copy of the foregoing Appendix was served via electronic mail and the Court's electronic filing system, this 27th day of July, 2020, to the following:

J. MICHAEL MCBRIDE, P.C.
John Michael McBride
6420 Southwest Blvd., Suite 112
Fort Worth, Texas 76109
(817) 877-1824 (office)
(817) 877-1797 (fax)
jmm@mcbridelegal.com
enotices@mcbridelegal.com

-and-

THE FILLMORE LAW FIRM, LLC
Charles E. Fillmore
H. Dustin Fillmore, III
1200 Summit Avenue, Suite 860
Fort Worth, Texas 76102
(817) 332-2351 (office)
(817) 870-1859 (fax)
dusty@fillmorefirm.com
chad@fillmorefirm.com
sprovost@fillmorefirm.com
marvin@fillmorefirm.com

*Attorneys for JT Palmer and Associates,
LLC*

-and-

Griffin S. Dunham
DUNHAM HILDEBRAND, PLLC
2416 21st Avenue South, Suite 303
Nashville, Tennessee 37212
615.933.5850
griffin@dhnashville.com

*Attorney for Robert T. Winfree, D.D.S.
and Olivia Winfree*

/s/ Evan Atkinson